

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Jade Lee,  
Debtor.

Carrington Mortgage Services, LLC as  
servicer for Bank of America, N.A.,  
Movant,

v.

Jade Lee,  
Debtor,

and

William C. Miller, Trustee,  
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER  
19-12878/ELF

**CERTIFICATION OF DEFAULT**

Kristen D. Little, Esquire, Attorney for Movant, certifies that Debtor has defaulted upon the terms of this Court's Stipulation and Order dated January 30, 2020. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtor and Debtor's Attorney on March 25, 2020. The Debtor has failed to cure the default as set forth in the Notice. The Debtor has failed to make the following payments:

Regular payments of \$1,144.13 from February 1, 2020 through April 1, 2020	\$3,432.39;
Attorney Fees associated with this default	\$300.00
Less Debtor's Suspense	\$(0.00)
<b>TOTAL DEFAULT</b>	<b>\$3,732.39</b>

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

/s/ Kristen D. Little

Dated: April 27, 2020

BY: \_\_\_\_\_

Kristen D. Little, Esquire  
Shapiro & DeNardo, LLC  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800/ fax (847) 954-4809  
PA BAR ID #79992  
klittle@logs.com  
pabk@logs.com

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